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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

Grisel Luna-Kelly,

Plaintiff,

v.

Santander Consumer USA Inc.,
 Equifax Information Services LLC,
 and Trans Union LLC,

Defendant.

Case No.: 2:20-cv-01321-KJD-EJY

**Stipulation to extend the deadline to
 file the proposed discovery plan and
 scheduling order**

(First request)

Grisel Luna-Kelly (“Plaintiff”) and Santander Consumer USA Inc., Equifax Information Services LLC (“Defendant” and together with Plaintiff as the “parties”), by and through their respective counsel, hereby stipulate to extend the deadline for the parties to file their stipulated or proposed discovery plan and scheduling order. The deadline to file the proposed plan is currently set for October 2, 2020.

Good cause exists to continue the deadline. The parties are actively exploring possible early resolution that may avoid the need for discovery by all sides.

The parties therefore agree that it is appropriate to extend the deadline for the parties to file a proposed or stipulated discovery plan and scheduling order to allow time for the parties to continue to explore early resolution. This request for an

1 extension is made specifically in this fee-shifting matter since briefing motions are
2 a significant expense and settlement discussions are ongoing. The parties therefore
3 seek to extend the deadline to file the proposed plan by 14 days, on or before
4 **October 16, 2020.**

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This is the first request for an extension of these deadlines.

Dated: October 5, 2020.

KIND LAW

/s/ Michael Kind
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/s/ Jennifer Rebecca Bergh
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Attorney for Trans Union LLC

IT IS SO ORDERED:

Clayton J. Zouchal
UNITED STATES MAGISTRATE JUDGE

DATED: October 6, 2020